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04/30/2003 01:12 PM

To: lharris@socplas.org
cc: (bcc: Mary Dominiak/DC/USEPA/US)
Subject: Follow-up Questions Regarding FMG LOI Commitments

In the March 14, 2003 FMG Letter of Intent there are commitments to a variety of environmental monitoring and product testing activities. We would like to understand precisely what work is being undertaken and would appreciate some clarification about some of the LOI items. After we understand the specifics of the LOI commitments, we will be in a better position to identify testing issues that are adequately dealt with in the LOIs vs. items that may need to be addressed in the ECA discussions commencing on June 6.

To that end, could you please provide a detailed description of the testing activities that are described in the LOI? In particular, EPA requests clarification on the following items:

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item 2 3) "as necessaryconduct ground and surface water analysis and assess results using the water screening levels..."

- What criteria will be used to determine if it is "necessary" to collect water samples?
- How many samples will be analyzed from each location and what is the sampling strategy?
- What test method (standard) will be used to analyze the samples (e.g., ASTM, EPA, OECD, other specify)?
- Will PFOA precursors and/or other constituent components of the product mixtures be analyzed for in addition to APFO/PFOA? If so which ones?
- What is the accuracy and precision of the test method?
- Has the test method been validated?
- Do you have a consolidated written description of the procedures that will be followed with this testing? If so, please provide a copy. If these procedures have already been identified in a submission to the Agency (ie. to AR226 or 8(e)), please identify the submission.
- What is the timing of this work?

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item 4 1) and 2) "analyze representative articles of commerce containing or made with dry fluoropolymer resins for the presence of APFO" and " for products coated or manufactured with liquid dispersions, analyze representative articles of commerce for presence of APFO"

- How will representative products be selected? What criteria will be used to determine which products are "representative"?
- How many samples of each representative product will be analyzed and what is the sampling strategy?
- Will the number of articles analyzed be sufficient to make a judgement about the overall contribution of fluoropolymer treated articles to PFOA in the environment?
- What test method (standard) will be used to analyze the samples (e.g., ASTM, EPA, OECD, other specify)?
- Will PFOA precursors and/or other constituent components of the product mixtures be analyzed for in addition to APFO/PFOA? If so which ones?
- What is the accuracy and precision of the test method?
- Has the test method been validated?
- What is the reporting criteria for the constituent components that will be reported?
- Do you have a consolidated written description of the procedures that will be followed with this testing? If so, please provide a copy. If these procedures have already been identified in a submission to the Agency (ie. to AR226 or 8(e)), please identify the submission.
- What is the timing of this work?

LOI Addendum III

item 4) "monitor groundwater and surface water for APFO in the vicinity of the facility"

- How many samples will be analyzed and what is the sampling strategy?
- What specific facilities are anticipated to be covered by the Addendum?
- What is the basis for selecting these facilities as opposed to monitoring all facilities?
- What test method (standard) will be used to analyze the samples (e.g., ASTM, EPA, OECD, other specify)?
- Will PFOA precursors and/or other constituent components of the product mixtures be analyzed for in addition to APFO/PFOA? If so which ones?
- What is the accuracy and precision of the test method?
- Has the test method been validated?
- Do you have a consolidated written description of the procedures that will be followed with this testing? If so, please provide a copy. If these procedures have already been identified in a submission to the Agency (ie. to AR226 or 8(e)), please identify the submission.
- What is the timing of this work?

We would appreciate a response by May 5, 2003. Please call me at 202 564 -8171 if you have any questions or need to discuss further. Thanks for your continued help on these matters.